

*UNITED STATES DISTRICT COURT***SOUTHERN DISTRICT OF TEXAS**

BROWNSVILLE DIVISION

**UNITED STATES OF AMERICA****V****LUGO-Fonseca, Martin Antonio**  
A213 277 704**CRIMINAL COMPLAINT**CASE NUMBER: 1:19-PO 049

I, the undersigned being duly sworn state the following is true and correct to the best of my knowledge and belief. On or about 09/07/2019 in Cameron County, in the SOUTHERN District of TEXAS defendant, an alien did,

knowingly, willfully and in violation of law attempted to gain illegal entry into the United States by concealment of a material fact, and in furtherance of such violation presented a Counterfeit United States Certificate of Citizenship,

in violation of Title 8 United States Code, Section(s) 1325 (a)(3).

I further state that I am a (n) Customs and Border Protection Officer and that this complaint is based on the following facts:

The defendant attempted to gain illegal entry into the United States through the Veterans International Bridge in Brownsville, Texas. The defendant presented a United States Certificate of Citizenship bearing his name and photograph to a U.S. Customs and Border Protection Officer. In Customs and Border Protection secondary, it was determined the document presented was counterfeit. Furthermore, the defendant was determined to be a citizen and national of Mexico with no legal status to enter and/or be in the United States.

Defendant had \$0 Mexican Pesos and \$333.00 U.S. dollars.

Continued on the attached sheet and made a part hereof: Yes X No

/s/

**Jessica L. Gonzales CBPEO**

Signature of Complainant

Sworn to before me and subscribed in my presence,

September 9, 2019

Date

at

BROWNSVILLE, TEXAS

City and State

Ignacio Torteya III, U.S. MAGISTRATE JUDGE

Name &amp; Title of Judicial Officer

Signature of Judicial Officer